



to the actions of the Union and cannot be imported upon the Union for purposes of liability. Even if tangentially relevant, the potential prejudice substantially outweighs any probative value of the exhibits. Plaintiff intends to use these exhibits to show motive of the Union through the actions of a non-union agent. This lawsuit is about the actions of Charlene Carter, her subsequent termination, and the Union's role in that termination. This lawsuit is not about the actions of Mr. Talburt, who has not been sued, and is not an agent of the Union.

Dated: July 1, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been filed via the Court's ECF system and all counsel of record have been served on this 1<sup>st</sup> day of July, 2022.

/s/ Adam S. Greenfield

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